

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Joshua Winer,

Plaintiff,

V.

) Civil Action Case No.

Umaymah Mohammad, AJP Educational ) 1:25-cv-02329-TWT

Foundation, Inc. A/K/A American Muslims )

For Palestine, WESPAC Foundation, Inc., )

Sean Eren as the representative of National )

Students for Justice in Palestine, Doctors )

Against Genocide Society, Cair-Nga Inc. )

A/K/A/ CAIR-Georgia, CAIR Foundation )

Inc., A/K/A Council on Islamic Relations )

or CAIR, Rupa Marya, Ibrahim Jouja as )

representative of Emory Students for )

Justice in Palestine, )

Defendants.

**DECLARATION OF PLAINTIFF’S COUNSEL, LAUREN  
ISRAELOVITCH, IN SUPPORT OF PLAINTIFF’S MOTION FOR  
SERVICE BY PUBLICATION UPON DEFENDANT SEAN EREN AS  
REPRESENTATIVE OF NATIONAL STUDENTS FOR JUSTICE IN  
PALESTINE**

I, Lauren Israelovitch, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am counsel for Plaintiff in the above-captioned matter. I submit this declaration in support of Plaintiff's Motion for Service by Publication upon Defendant Sean Eren, in his capacity as representative of National Students for Justice in Palestine ("NSJP"). I have personal knowledge of the facts stated herein.
2. Since the commencement of this action, Plaintiff has undertaken extensive and sustained measures to locate and personally serve Defendant Eren, including:
  - a) retaining a licensed private investigator, Jane Holmes of Patricia Lane Investigations, to conduct comprehensive searches of public and proprietary databases, review media reports of Defendant Eren's activities in the Palestine movement, and examine online and social media sources;
  - b) hiring a professional process server, whose sworn affidavit of non-service is attached as Exhibit A, to attempt personal service on four separate occasions at all known addresses associated with Defendant Eren; and
  - c) contacting five separate law firms that previously represented NSJP to determine whether they would accept service on behalf of Defendant

Eren in his representative capacity. Each either declined or indicated they could not assist by failing to respond to my inquiries.

3. Ms. Holmes revealed to me that Defendant Eren is believed to be Sean Eren Rutledge, born July 6, 2000, a graduate of the Rhode Island School of Design and reportedly a member of Columbia University's Class of 2027 (Architecture).
4. Database searches conducted by Ms. Holmes were shared with my office and produced conflicting current address information, including:
  - a) Hyattsville, Maryland (listed as current in one database, but believed by Ms. Holmes to actually be the location of Defendant Eren's family members);
  - b) 710 Riverside Drive, Apt. 2C, New York, NY 10031 (listed as current in another database); and
  - c) prior addresses in Brooklyn, New York (2022–2023), Providence, Rhode Island (2021), and Durham, North Carolina (2018).
5. Given the indications of current enrollment at Columbia University, service was attempted at the Riverside Drive address in New York, the only recent New York residence associated with him. That attempt was unsuccessful.

6. Despite these exhaustive measures—spanning multiple states, databases, in-person service attempts, and professional outreach—Defendant Eren’s whereabouts remain unknown, and personal service has not been possible.
7. Based on these facts, I believe Defendant Eren “cannot, after due diligence, be found” within the meaning of O.C.G.A. § 9-11-4(f)(1)(A), and that service by publication is the only remaining method to provide him with notice of this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14<sup>th</sup> day of August, 2025.

*/s/ Lauren Israelovitch*

Lauren Israelovitch  
Senior Litigation Counsel  
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# **Exhibit A**

# UNITED STATES DISTRICT COURT

for the  
Northern District of Georgia

**JOSHUA WINER**

*Plaintiff*

v.

**UMAYMAH MOHAMMAD et al**

*Defendant*

Civil Action No. 1:25-CV-2329-TWT

## AFFIDAVIT OF NONSERVICE

I, Ramon Lebron, state:

I am authorized to serve process in the state where the subject was served.

After careful inquiry and diligent attempts, I was unable to serve Sean Eren A/K/A Sean Eren Rutledge, Representative of National Students for Justice in Palestine as I could not find the subject or information as to the location of the subject's whereabouts.

### Serve Attempt #1

Date / Time: June 17, 2025 6:40 pm

Address: 710 Riverside Drive, Apt. 2C, New York, NY 10031

Photo: See Exhibit 1a below

Geolocation: <https://google.com/maps?q=40.8291963302,-73.9503834397>

Description of attempt: No answer at the buzzer.

### Serve Attempt #2

Date / Time: June 20, 2025 10:42 am

Address: 710 Riverside Drive, Apt. 2C, New York, NY 10031

Photo: See Exhibit 2a below

Geolocation: <https://google.com/maps?q=40.8291123867,-73.9502877483>

Description of attempt: No answer at the buzzer; the subject's name isn't the name on the buzzer.

### Serve Attempt #3

Date / Time: June 24, 2025 12:43 pm

Address: 710 Riverside Drive, Apt. 2C, New York, NY 10031

Photo: See Exhibit 3a below

Geolocation: <https://google.com/maps?q=40.8290377545,-73.950242792>

Description of attempt: The name on the buzzer is Giselle Canals; there was no answer.

Serve Attempt #4

Date / Time: June 28, 2025 9:48 pm

Address: 710 Riverside Drive, Apt. 2C, New York, NY 10031

Photo: See Exhibit 4a below

Geolocation: <https://google.com/maps?q=40.8290961512,-73.9503675754>

Description of attempt: There was no answer at the door. No contact was made. Observed a callbox/mailbox listing for a different individual. A neighbor stated that they do not recognize the subject's name.

Total Cost: \$129.40

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FACTS HEREIN ARE TRUE AND CORRECT.

Executed in

Bronx County

NY on 7/8/2025.

*/s/ Ramon Lebron*

\_\_\_\_\_  
Signature

Ramon Lebron

+1 (212) 804-8061



Exhibit 1a)













Exhibit 4a)

